

**EXHIBIT B**

**Maps and Oxy Foundations Joinder**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)  
(Jointly Administered)

**FOUNDATION SERENDIPITY, FOUNDATION ELEMENTS, SERENDIPITY NETWORK LTD AND LIQUIDITY NETWORK LTD'S JOINDER IN MAPS VAULT LIMITED'S MOTION *IN LIMINE* TO EXCLUDE CERTAIN UNTIMELY AND IMPROPER REBUTTAL EXPERT TESTIMONY**

Fondation Serendipity, Fondation Elements, Serendipity Network Ltd. and Liquidity Network Ltd (collectively, the “**Foundations**”), by and through their undersigned counsel, hereby submit this joinder (the “**Joinder**”) to *Motion in Limine to Exclude Certain Improper Rebuttal Expert Testimony* (the “**Motion to Exclude**”)<sup>2</sup> filed by Maps Vault Limited (“**Maps Vault**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), which seeks to exclude, at any hearing on the *Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 5202] (the “**Estimation Motion**”), certain untimely and improper expert opinions regarding the fundamental value of OXY, MAPS, and SRM tokens set forth in the *Rebuttal Expert Report of Sabrina T. Howell* (the “**Howell Rebuttal Report**”). In support thereof, the Foundations respectfully submit as follows:

## JOINDER

1. The Foundations hereby join in, adopt, and incorporate by reference the arguments advanced in the Motion to Exclude for the reasons set forth therein.

<sup>1</sup> Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings set forth in the Estimation Motion.

2. For the reasons set forth in the Motion to Exclude, the Foundations respectfully request that the Court grant the Motion to Exclude and approve the relief requested therein.

**RESERVATION OF RIGHTS**

3. Nothing contained in this Joinder shall constitute a waiver of the Foundations' rights or remedies under the Bankruptcy Code or applicable law. The Debtor reserves its rights to (i) further amend or supplement this Joinder at any time; (ii) raise, join in, or respond to any other arguments or objections made relating to the Motion to Exclude; and (iii) be heard at any hearing to consider the Estimation Motion.

WHEREFORE, the Foundations join in the Motion to Exclude and respectfully request that the Court grant the Motion to Exclude and approve the relief requested therein.

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Dated: March 18, 2024  
Wilmington, Delaware

Respectfully submitted,

**REED SMITH LLP**

/s/ Kurt F. Gwynne

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